

# EXHIBIT A

*Senate and House Defendants' Response in  
Opposition to Plaintiffs' Motion in Limine to  
Exclude Intent-Related Testimony Reliant on  
Privileged Communications*



1  
2 IN THE UNITED STATES DISTRICT COURT.  
3 FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

4 -----x  
5 THE SOUTH CAROLINA STATE CONFERENCE  
6 OF THE NAACP

7 and

8 TAIWAN SCOTT, ON BEHALF OF HIMSELF Case No.  
9 AND ALL OTHER SIMILARLY SITUATED 3:21-CV-03302  
10 PERSONS, JMC-TJH-RMG

11 Plaintiffs,

12 Vs.

13 THOMAS C. ALEXANDER, IN HIS OFFICIAL  
14 CAPACITY AS PRESIDENT OF THE SENATE;  
15 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY  
16 AS CHAIRMAN OF THE SENATE JUDICIARY  
17 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL  
18 CAPACITY AS SPEAKER OF THE HOUSE OF  
19 REPRESENTATIVES; CHRIS MURPHY, IN HIS  
20 OFFICIAL CAPACITY AS CHAIRMAN OF THE  
21 HOUSE OF REPRESENTATIVES JUDICIARY  
COMMITTEE; WALLACE H. JORDAN, IN HIS  
OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE  
OF REPRESENTATIVES ELECTIONS LAW  
SUBCOMMITTEE; HOWARD KNAPP, IN HIS  
OFFICIAL CAPACITY AS INTERIM EXECUTIVE  
DIRECTOR OF THE SOUTH CAROLINA STATE  
ELECTION COMMISSION; JOHN WELLS, JOANNE  
DAY, CLIFFORD J. EDLER, LINDA MCCALL,  
AND SCOTT MOSELEY, IN THEIR OFFICIAL  
CAPACITIES AS MEMBERS OF THE SOUTH  
CAROLINA STATE ELECTION COMMISSION,  
Defendants.

22 -----x

23 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION  
24 BREEDEN JOHN  
25 Tuesday, August 9, 2022



1 JOHN

2 Q. Would you consider any  
3 senators part of the core team or  
4 was the core team primarily Senate  
5 staff members?

6 A. Staff.

7 Q. Aside from Mr. Terreni any  
8 outside counsel?

9 A. No. Not on a regular  
10 basis.

11 Q. And who would have not been  
12 on a regular basis for outside  
13 counsel?

14 A. We would occasionally speak  
15 with John Gore with Jones Day.

16 Q. Do you recall how often?

17 A. For me it was, you know,  
18 over the congressional maybe four or  
19 five times. That's a rough  
20 estimate, something like that.

21 Q. For meetings were they Zoom  
22 or by Zoom?

23 A. Yes, by Zoom.

24 Q. Did you also have email and  
25 any other correspondence with